

Exhibit A

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Rhode Island

John Doe, a Pseudonym

Plaintiff

v.

Brown University

Defendant

Civil Action No. 2017-191-JJM-LDA

*A True copy attol
James Sylvestre
10/10/18
constable &
disseminated per*

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: KEEPER OF MEDICAL AND/OR PSYCHIATRIC RECORDS, RHODE ISLAND HOSPITAL,
593 Eddy Street, Providence, RI 02903

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See Documents Requested under Schedule A (attached hereto)

Place: Nixon Peabody LLP
Attn: Steven M. Richard, Esq.
One Citizens Plaza, Providence, RI 02903

Date and Time:

11/12/2018 10:00 am

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/10/2018

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

(4403)

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Brown University

, who issues or requests this subpoena, are:
Steven M. Richard, Esq. (4403), Nixon Peabody, LLP, address above, srichard@nixonpeabody.com, 401-454-1020.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 2017-191-JJM-LDA

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____

on *(date)* _____

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.: _____

CERTIFICATE OF SERVICE

I certify that, on October 10, 2013, I served electronically a copy of this subpoena duces tecum upon Plaintiff's counsel: Susan Kaplan, Esq. at skaplan@lawkaplan.com and Sonja Deyoe, Esq. at sld@the-straight-shooter.com.

A handwritten signature in black ink, appearing to be 'Stu' followed by a stylized monogram, is written over a horizontal line.

SCHEDULE A

You are hereby requested to produce certified copies of all of the following documents regarding:

Name: [REDACTED]

DOB: [REDACTED] 1994

Current Address: 637 46th Avenue, San Francisco, CA 9412
(Formerly residing in Providence, RI as a student at Brown University between 9/1/13 and 5/31/18)

1. Copies of all medical records, including but not limited to, diagnostic and treatment records relating to [REDACTED] which reflect any treatment rendered to him for any injury, illness, disease or complaint suffered by him dated between September 1, 2013 and the present. This request includes records of care or treatment provided by Kim Basu, M.D., Jamison Cohn, M.D., and Daniel Golding – all of whom [REDACTED] has identified as witnesses having knowledge about “his physical injuries and state of mind.”

2. Copies of all mental health, psychiatric or psychological treatment records or reports dated between September 1, 2013 and the present relating to [REDACTED] including but not limited to any all counseling records maintained by the Adult Psychiatric Department.

3. Copies of all office notes, patient questionnaires/intake forms, notations, charts, treatment notes, reports, correspondence (including any correspondence received from any third-party such as attorneys, insurers, or other health care facilities or providers), laboratory test results, x-ray reports, prescriptions, reports of payments and bills and any other documents relating to [REDACTED] and dated between September 1, 2013 to the present that have not been otherwise produced in response to requests numbered 1 and 2 above.

NOTICE: This subpoena is issued by Defendant Brown University, through its counsel, Steven M. Richard (srichard@nixonpeabody.com, 401-454-1020) in litigation captioned John Doe, a pseudonym v. Brown University, C.A. No. 2017-191-JJM-LDA (U.S. Dist. Ct. D.R.I.). Plaintiff in the litigation is proceeding under a John Doe pseudonym. To the extent that any motion or other court filing is submitted in connection with this subpoena, the patient's name should be redacted in any public filing and revealed only in a filing under seal. Plaintiff's counsel are Susan Kaplan, Esq. (skaplan@lawkaplan.com, 347-683-2505) and Sonja Deyoe, Esq. (sld@the-straight-shooter.com, 401-864-5877), in the event that the Keeper of Records wishes to discuss any issues relating to the production of the patient's records in response to Brown University's subpoena.